

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

DAVID PITTS,

Plaintiff(s),

Case No.: 3:20-cv-00074-BR

v.

MOTION FOR LEAVE TO APPEAR  
*PRO HAC VICE*

G4S SECURE SOLUTIONS (USA), Inc., et al.

Defendant(s).

---

Attorney Kelly Eisenlohr-Moul requests special admission *pro hac vice* to the Bar of the United States District Court for the District of Oregon in the above-captioned case for the purposes of representing the following party (or parties):  
G4S Secure Solutions (USA), Inc., Stewart Becker, Paul Traynor and Facebook, Inc.

---

In support of this application, I certify that: 1) I am an active member in good standing with the Georgia-558153 State Bar; and 2) that I have read and am familiar with the Federal Rules of Evidence, the Federal Rules of Civil and Criminal Procedure, the Local Rules of this Court, and this Court's Statement of Professionalism.

I understand that my admission to the Bar of the United States District Court for the District of Oregon is solely for the purpose of litigating in the above matter and will be terminated upon the conclusion of the matter.

**(1) PERSONAL DATA:**

Name: Eisenlohr-Moul Kelly  
(Last Name) (First Name) (MI) (Suffix)  
Agency/firm affiliation: Dinsmore & Shohl LLP  
Mailing address: 1100 Peachtree Street, Suite 950  
City: Atlanta State: Georgia Zip: 30309  
Phone number: (470) 300-5337 Fax number: \_\_\_\_\_  
Business e-mail address: kelly.eisenlohr-moul@dinsmore.com

(2) **BAR ADMISSION INFORMATION:**

(a) State bar admission(s), date(s) of admission, and bar number(s):  
Georgia - 12-14-2007 - 558153

Florida - 09-29-2017 - 1003246

(b) Other federal court admission(s) and date(s) of admission:

USDC, Northern District of Georgia - 04-22-2008

USDC, Northern District of Florida - 10-25-2017

(3) **CERTIFICATION OF DISCIPLINARY ACTIONS:**

☒ I am not now, nor have I ever been, subject to any disciplinary action by any state or federal bar association.

☐ I am now or have been subject to disciplinary action by a state or federal bar association. (Attach letter of explanation.)

(4) **CERTIFICATION OF PROFESSIONAL LIABILITY INSURANCE:**

Pursuant to LR 83-3, I have professional liability insurance, or financial responsibility equivalent to liability insurance, that meets the insurance requirements of the Oregon State Bar for attorneys practicing in this District, and that will apply and remain in force for the duration of the case, including any appeal proceedings.

(5) **CM/ECF REGISTRATION:**

I acknowledge that I will become a registered user of the Court's case management and electronic case filing system (CM/ECF) upon approval of this application, and I consent to electronic service pursuant to Fed. R. Civ. P. 5(b)(2)(E) and the Local Rules of the District of Oregon.

**Certification of Attorney Seeking *Pro Hac Vice* Admission:** I have read and understand the requirements of LR 83-3, and I certify that the above information is true and correct.

DATED: 01/21/2020

/s/ Kelly Eisenlohr-Moul

(Signature)



**REQUIREMENT TO ASSOCIATE WITH LOCAL COUNSEL:**

LR 83-3(a)(1) requires applicants for *pro hac vice* admission to associate with local counsel, unless requesting a waiver of the requirement under LR 45-1.

To request a waiver of the requirement to associate with local counsel under LR 45-1, check the following box:

- ☐ I seek admission for the limited purpose of filing a motion related to a subpoena that this Court did not issue. Pursuant to LR 45-1(b), I request a waiver of the LR 83-3(a)(1) requirement to associate with local counsel and therefore do not include a certification from local counsel with this application.

To associate with local counsel, provide the following information about local counsel, and obtain the signature of local counsel.

Name: Reese Luke W.  
(Last Name) (First Name) (MI) (Suffix)

OSB number: 076129

Agency/firm affiliation: Garrett Hemann Robertson P.C.

Mailing address: 1011 Commercial St. NE

City: Salem State: Oregon Zip: 97301-1049

Phone number: (503) 581-1501 Fax number: (503) 581-5891

Business e-mail address: lreese@ghrlawyers.com

**CERTIFICATION OF ASSOCIATE LOCAL COUNSEL:**

I certify that I am a member in good standing of the bar of this Court, that I have read and understand the requirements of LR 83-3, and that I will serve as designated local counsel in case number 3:20-cv-00074-BR.

DATED: 1/22/2020

  
(Signature of Local Counsel)

## **CERTIFICATE OF SERVICE**

I hereby certify that I submitted this filing to the Clerk of Court using the CM/ECF system, which will automatically send electronic mail notification of such filing to counsel of record.

This 23<sup>rd</sup> day of January, 2020.

/s/ Kelly Eisenlohr-Moul

Kelly Eisenlohr-Moul

Pro Hac Vice

Dinsmore & Shohl LLP

1100 Peachtree Street

Suite 950

Atlanta, Georgia 30309

Attorney for Defendants